

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

LOUIS ALBERGHINI,
Plaintiff,

v.

SIMONDS INDUSTRIES INC.,
Defendant.

CIVIL ACTION NO. 04-40092NMG

Jonathan R. Sigel
BBO# 559850

John M. Flick
BBO# 652169

JOINT STATEMENT FOR RULE 16
SCHEDULING CONFERENCE

Pursuant to Rule 16.1 of the Local Rules of the United States District Court for the District of Massachusetts and the Court's Order for Scheduling Conference, the parties submit the following Joint Statement.

I. PROPOSED PRE-TRIAL SCHEDULE

<u>Pre-Trial Event</u>	<u>Agreed, Proposed Event Dates</u>
Voluntary Disclosures Served	October 14, 2004
Written Discovery (Not Including Requests for Admissions)	December 23, 2004
Service of Requests for Admissions	January 14, 2005
Rule 26(a)(2)(B) Disclosure of Trial Expert by Plaintiff	January 31, 2005
Rule 26(a)(2)(B) Disclosure of Trial Expert by Defendant	February 15, 2005
Fact Witness Depositions Completed	February 28, 2005

Amendments and/or Supplements to Pleadings	March 15, 2005
Expert Depositions (if any) Completed	March 15, 2005
Summary Judgment Motions or Other Dispositive Motions Filed	April 15, 2005
Opposition (if any) to Summary Judgment or Other Dispositive Motions Filed	May 16, 2005
Pre-Trial Conference	In or About June 2005

II. CERTIFICATIONS BY PARTIES AND COUNSEL

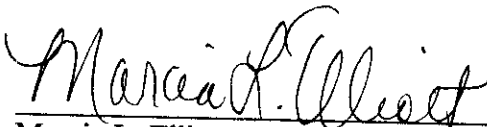
Each party certifies that the party has filed the required Local Rule 16.1 Certifications with the court.

III. OTHER MATTERS

- A. The parties have considered trial by Magistrate Judge and do not consent to same.
- B. A written settlement proposal will be presented by Plaintiff to Defendant on or before October 7, 2004, and defense counsel will be prepared to respond to the proposal at the Scheduling Conference.

LOUIS ALBERGHINI

By his attorneys,



Marcia L. Elliott, BBO# 564291
John M. Flick, BBO# 652169
Elliott Law Office, P.C.
301 Central Street
Gardner, MA 01440
(978) 632-7948

SIMONDS INDUSTRIES INC.

By its attorneys,



Jonathan R. Sigel, BBO# 559850
Kathryn E. Abare, BBO# 647594
Bowditch & Dewey, LLP
311 Main Street, P.O. Box 15156
Worcester, MA 01615-0156
(508) 791-3511

Dated: October 4, 2004